



Good Morning Everyone!

ATTENTION

All Participants:
SIGN-IN USING
THE CHAT BOX
PLEASE TYPE YOUR
NAME AND EMAIL



Community Development Block Grant Program

Certified CDBG Administrator Continuing Education Workshop

2021



OKLAHOMA



**ODOC Certified CDBG Administrator
Continuing Education Workshop
Virtual Meeting - Zoom Invitation**

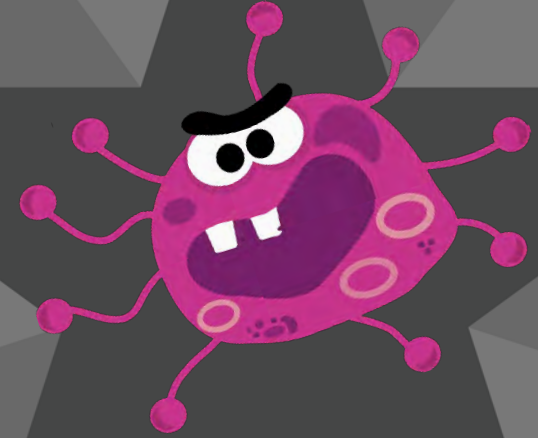
Tuesday, October 12, 2021

8:30 a.m. to 12:30 p.m.

TENTATIVE AGENDA

Zoom Chat-box Sign-In (Required for All Participants)	8:30 - 8:45	Linda Goode
Welcome	8:45	Kellon Dixon
Update on CDBG-CV	8:45 - 9:00	Kellon Dixon
CDBG Project Management Guide (overview of changes)	9:00 - 10:00	Robin Slawson
New Section 3 Policies & Procedures (overview of policy & required forms)	10:00 - 11:00	Robin Slawson
Contract Modifications	11:00 - 11:15	Christy Davis
OK Grants Roles-Status Changes	11:15 - 11:30	Christy Davis
Q & A – Group Discussion	11:30 - 12:30	CD Staff/Planners All Participants

CDBG-CV Updates



CDBG-CV Updates

Applications for Round 3 of CDBG-CV funds are due back by **November 1, 2021**.

Eligible applicants for Round 3 of the CDBG-CV Program are units of local government (incorporated towns, cities, and counties) that are not participants in the CDBG Entitlement Program. Applicants that received funding in CV Round 1 cannot apply for funds in CV Round 3. Only UGLGs that did not receive funding in either CV Round 1 or CV Round 2 may apply for CV Round 3.

For any unobligated or unspent funds remaining after awards are made in CV Round 3, (ODOC/CD) will recalculate and distribute the allocation at any time to eligible communities that did not receive funding in previous rounds and/or communities that demonstrate a need that exceeds their previous allocation of CDBG-CV funds.

CV Round 3

Competitive

Grant Maximum \$450,000

Grant Minimum- \$150,000

Eligible activities to include:

- Utility Assistance
- Mortgage/Rental Assistance
- Medical Assistance
- Nutrition Assistance
- Mental Health Assistance
- Daycare or After-School Assistance
- Job Training Assistance
- Rehabilitation Assistance

CDBG-CV Staff & Resources

For questions or comments regarding the CV Grants please contact:

Kellon Dixon

405-215-5626

Kellon.Dixon@okcommerce.gov

Taylor Huizenga

405-308-6691

Taylor.Huizenga@okcommerce.gov

More information can be found on our web page:

<https://www.okcommerce.gov/reporting-compliance/cdbg-covid-19/>

MANAGEMENT GUIDE UPDATES



RECENT ADDITIONS, DELETIONS, AND REVISIONS

OCTOBER 2021

- Policy 401-2 Included guidance for grantee to request extension of 120-day RROF.
- Policy 401.1 Included guidance for submitting Modification Requests on Grantee Letterhead.
- Policy 401-4.1.7 Included guidance for requesting additional funds to complete an activity.
- Policy 401 – Added the EDIF forms to this section.
- Policy 402 – No changes
- Policy 403-1.2 Included guidance for grantee to request extension of 120-day RROF
- Policy 403-Form 403.1- updated the RROF and Removal of Contract Conditions Checklist:
 - Exempt:
 - Deleted the Grantee's SAM.gov check as it is submitted with application.
 - Added Procurement upload of RFP/RFQ for service contracts.
 - Added Section 3 Resolution and Plan
 - Deleted Form Compliance Documentation Checklist
 - Deleted Form Noise Abatement and Control (link can be found on worksheet)
 - Deleted Form Environmental Certification
- Policy 404 – Added Section 3 Policies & Procedures, and Forms
- Policy 405 – No Changes
- Policy 406 – Added new requirement for drawing construction funds & supporting documents
- Policy 407 – Revised Attachment 23 Construction Bid Document sample:
 - Notice of Award form – included new statement for section 3
 - Revised the Section 3 information to include current process
 - Revised 407.4 Pre-construction checklist to include Section 3 Notice
- Policy 408 - 2.Pre-construction Conference Checklist; Added 2.58 "Review the Section 3 Reporting Requirements for Reporting Worker Hours and Qualitative & Quantitative Benchmarks".
 - Added Form 408.6 DOL Supplemental Contract Language
- Policy 409 – Deleted/Replaced Section 3 Reporting form
 - Added 409.3 Section 3 Final Labor Hours Report
 - Revised the Closeout Checklist to include the above 409.3 Report Form
 - Added "a recommendation to submit Project Photos" on Closeout Checklist



Oklahoma Department of Commerce (ODOC) - Community Development Block Grant Program Request for Release of Funds & Removal of Contract Conditions Checklist

Initiate a Request for Release of Funds in OKGrants. Prepare Checklist, save as "RROF Checklist_Name_Contract Number" & upload (do not scan checklist). Upload all applicable Items with supporting documents as individual files using the checklist as a guide into ROF Menu - Uploads, change status to submit by the Authorized Official.

Grant Recipient Name: <input type="text"/>				Submitted Items - GRANTEE	Reviewed Items - ODOC ONLY
CDBG Contract Number: <input type="text"/>					
Describe Project(brief): <input type="text"/>					
<p>Determine Level of Environmental Review - Please complete separate environmental forms for each applicable activity & refer to the CDBG Sub-Recipient Management Guide and Forms.</p> <p>1. Exempt Activity - Complete and Upload Forms into OKGrants</p> <p>a. Part 58 Environmental Review-Exempt Activity (Form 403.2)</p> <p>*Be sure to <u>ONLY</u> include funds committed to Exempt Activities under Sec. 58.34 (a)(3) (i.e., Consulting, Engineering, Inspection/professional services)</p> <p>b. Contractor Debarment/Exclusion Review Cert (Form 407.2) Verify with DUNS # and upload www.SAM.gov</p> <p>c. Procurement -Exempt Activities - UPLOAD RFP/RFQ & Service Contracts</p> <p>2. Categorically Excluded <u>NOT</u> Subject to 58.5:</p> <p>a. Part 58 Environmental Review-Exempt-CENST Format (Form 403.2)</p> <p>Complete and Upload Categorically Excluded Not Subject to Section 58.5 Form (Pursuant to 24 CFR Part 58.35(b))</p> <p>*Be sure to <u>ONLY</u> include funds committed to Categorically Excluded activities under 58.35(b)(3) (ex. Purchase of Fire Truck)</p> <p>3. Categorically Excluded <u>SUBJECT</u> TO 58.5 - Complete All Worksheets</p> <p>Upload individually with supporting documentation https://www.hudexchange.info/programs/environmental-review/federal-related-laws-and-authorities/</p>				<p>1a. <input type="checkbox"/></p> <p>1b. <input type="checkbox"/></p> <p>1c. <input type="checkbox"/></p> <p>2a. <input type="checkbox"/></p> <p>3. <input type="checkbox"/></p> <p>Env. Worksheets <input type="checkbox"/></p>	<p>1a. <input type="checkbox"/></p> <p>1b. <input type="checkbox"/></p> <p>1c. <input type="checkbox"/></p> <p>2a. <input type="checkbox"/></p> <p>3. <input type="checkbox"/></p> <p>Env. Worksheets <input type="checkbox"/></p>
1. Airport Hazards <input type="checkbox"/>	5. Coastal Zone Mgmt. <input type="checkbox"/>	9. Farmland Protection <input type="checkbox"/>	13. Sole Source Aquifers <input type="checkbox"/>		
2. Coastal Barrier Resources <input type="checkbox"/>	6. Contamination & Toxic substance <input type="checkbox"/>	10. Floodplain Management <input type="checkbox"/>	14. Wetlands Protection <input type="checkbox"/>		
3. Flood Insurance <input type="checkbox"/>	7. Endangered Species <input type="checkbox"/>	11. Historic Preservation <input type="checkbox"/>	15. Wild and Scenic Rivers <input type="checkbox"/>		
4. Air Quality <input type="checkbox"/>	8. Explosive & Flammable Facilities <input type="checkbox"/>	12. Noise Abatement & Control <input type="checkbox"/>	16. Environmental Justice <input type="checkbox"/>		

Complete and Upload Categorically Excluded Form:

Categorically Excluded under 58.35(a)(CEST) (Form 403.3)

*Be sure to ONLY include funds committed to Categorically Excluded activities under 58.35(a); (i.e., Replacement of water/sewer lines, reconstruction of curbs and sidewalks, repaving of streets)

a. Historical Clearance Letter (SHPO & THPO) (403 Attachment 29,30,31)

<https://www.okhistory.org/shpo/section106.htm>
<https://www.okhistory.org/shpo/tribal106>

b. Archaeological Survey Letter - <https://www.ou.edu/archsurvey/cultural-resource-management/agencies-and-applicants>



Did the CE Form 403.3 (statutory checklist) convert the activity to exempt at 58.34 (a)(12)?
 IF YES, skip to complete Item f, RROF 7015.15
 IF NO, complete c,d,e,f, as applicable to activity:
 (activity improvements that exceed 20%; compliance/mitigation to any related authority)

c. Activity located in a Floodplain? <https://www.hudexchange.info/programs/environmental-review/floodplain-management/FEMA-FIRMette-Map> (Please provide Panel No. & Date below)

➤ Eight Step Analysis (24 CFR Part 55.20) Upload or blank if N/A:
 Early Notice (must be published one time, 15 day comment period)
 Final Notice (must be published one time, 7 day comment period)
 (403 Attachment 25)

d. Notice of Intent (Proof of Publication or Posting) (403 Attachment 26)

DIST LIST (403 Attachment 20) - Distribute the Notice to the appropriate agencies and interested parties in relation to the activity and upload with publication

f. REQUEST RELEASE OF FUNDS - 7015.15 (Form 403.6)

4. Environmental Assessment (EA) - Complete All Worksheets

Upload individually with supporting documentation <https://www.hudexchange.info/programs/environmental-review/federal-related-laws-and-authorities/>

1. Airport Hazards	5. Coastal Zone Mgmt.	9. Farmland Protection	13. Sole Source Aquifers
2. Coastal Barrier Resources	6. Contamination & Toxic Substance	10. Floodplain Management	14. Wetlands Protection
3. Flood Insurance	7. Endangered Species	11. Historic Preservation	15. Wild and Scenic Rivers
4. Air Quality	8. Explosive & Flammable Facilities	12. Noise Abatement & Control	16. Environmental Justice

3. CATEX Form 3. CATEX Form

☐ ☐

3a. ☐ 3a. ☐

3b. ☐ 3b. ☐

3c. ☐ 3c. ☐

☐ ☐

3d. ☐ 3d. ☐

3e. ☐ 3e. ☐

3f. ☐ 3f. ☐

4. Env. Worksheets 4. Env. Worksheets

☐ ☐

Complete and Upload Environmental Assessment Form:

Environmental Assessment Checklist (Form 403.4):

a. Historical Clearance Letter (SHPO & THPO) (403 Attachment 29,30,31)

<https://www.okhistory.org/shpo/section106.htm>
<https://www.okhistory.org/shpo/tribal106>

b. Archaeological Survey Letter - <https://www.ou.edu/archsurvey/cultural-resource-management/agencies-and-applicants>

c. Floodplain Management- <https://www.hudexchange.info/programs/environmental-review/floodplain-management/FEMA-FIRMette-Map> -Please provide Panel No. & Date below:

➤ Eight Step Analysis (24 CFR Part 55.20) Upload or blank if N/A:
 ➤ Early Notice (must be published one time, 15 day comment period)
 ➤ Final Notice (must be published one time, 7 day comment period)
 (403 Attachment 25)

d. Combined Notice (403 Attachment 27)
 (Proof of Publication or Posting)

e. DIST LIST (403 Attachment 20) - Distribute the Notice to the appropriate agencies and interested parties in relation to the activity and upload with publication

f. REQUEST RELEASE OF FUNDS - 7015.15 (Form 403.6)

OTHER REQUIREMENTS

5. Leverage/Matching Funds (Form 403.1):

➤ UPLOAD Leverage Confirmation & supporting document as applicable.

6. Insurance & Bonding (as applicable) UPLOAD items:

➤ Evidence of City/County general liability insurance coverage
 ➤ Evidence of City/County bonding

7. Anti-Displacement Plan (402 Attachment 15)

➤ UPLOAD Executed Plan

8. Fair Housing Activity - UPLOAD one (1) activity:

Refer to Project Management Guide - Policy 404

9. Section 3 - UPLOAD Resolution & Plan adopted by sub-recipient:

Refer to Project Management Guide - Policy 404

10. Engineer Acknowledgment (Form 403.5)

➤ UPLOAD Executed Form

11. ODEQ Permit to Construct -UPLOAD for W/S Eng. Contracts & Part II Contract Conditions as applicable. Leave blank if N/A

4. EA Form

☐

4a. ☐

4b. ☐

4c. ☐

4d. ☐

4e. ☐

4f. ☐

5. ☐

6. ☐

7. ☐

8. ☐

9. ☐

10. ☐

11. ☐

4. EA Form

☐

4a. ☐

4b. ☐

4c. ☐

4d. ☐

4e. ☐

4f. ☐

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8. ☐

9. ☐

10. ☐

11. ☐

Preparer Name, Title, & Agency (Typed)

ODOC Reviewer Name & Title

Date

Date

REVISED RROF CHECKLIST

ENVIRONMENTAL REVIEW

ITEMS ADDED:

EXEMPT ACTIVITIES:

- PROCUREMENT OF PROFESSIONAL SERVICES AS PER APPLICATION BUDGET
RFP/RFQ & CONTRACTS UPLOADED

HISTORICAL CLEARANCE:

- LINK TO TRIBAL LISTING AT STATE HISTORIC PRESERVATION OFFICE WEBSITE
- LINK TO ARCHEOLOGICAL WEBSITE

FLOODPLAIN MANAGEMENT:

- AREA TO TYPE IN THE FEMA MAP PANEL NUMBER AND DATE

DISTRIBUTION LIST

ITEMS DELETED:

COMPLIANCE DOCUMENTATION
CHECKLIST

NOISE ABATEMENT AND CONTROL
FORM

ENVIRONMENTAL CERTIFICATION
FORM

REVISED RROF CHECKLIST

CONTRACT CONDITIONS

ITEMS ADDED:

FAIR HOUSING ACTIVITY:

- UPLOAD ONE (1) ACTIVITY

DEQ PERMIT TO CONSTRUCT:

- W/S ENGINEERING CONTRACTS & PART II as applicable

NO SIGNATURE REQUIRED ON THE CHECKLIST

- TYPED PREPARERS NAME AND DATE
- SAVE FORM AS (RROF Checklist_Name_Contract Number)
- UPLOAD – DO NOT SCAN

SECTION 3 – ADOPT A RESOLUTION & PLAN

WEEKLY PAYROLL REPORTS

WEEKLY DAVIS-BACON PAYROLL
REPORTS WILL BE UPLOADED WITH
ALL ADVANCES FOR CONSTRUCTION

WHY?

- * REDUCES MONITORING REVIEW TIME
- * SUPPORTS BEING PROACTIVE WITH ANY ISSUES OR RESTITUTION IN A TIMELY MANNER

50% CDBG – 50% LEVERAGE

EACH OF THE FOLLOWING CDBG CONTRACTS
REAP, SMALL CITIES, WATER/WASTEWATER
CONSTRUCTION PAY ADVANCE MUST BE
DIVIDED IN EQUAL FUNDS AND NOTATED ON
THE PURCHASE ORDERS

50% CDBG – 50% LEVERAGE

ELIMINATES A REPAYMENT OF CDBG
FUNDS FOR PROJECTS UNDER BUDGET

Section 3 Update

24 CFR part 75

Policies and Procedures will be updated for tracking labor hours and other requirements to ensure compliance with the new rules for projects for which funds are committed on or after July 1, 2021



Section 3 Business Concern

What Does **“Section 3 Business Concern”** mean?

A Section 3 business concern is a business that meets at least one of the following criteria, documented within the last six-month period:

1. At least 51 percent owned and controlled by low- or very low-income persons;
2. Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
3. A business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

Section 3 Business

<https://portalapps.hud.gov/Sec3BusReg/BRegistry/AmISection3>

Am I a Section 3 Business?

Please complete the information below and click the "Check" button. If you qualify based on at least one basis below then your organization is considered a Section 3 business.

1. Is at least 51 percent of the business owned and controlled by low- or very low- income persons?

a. Percent owned and controlled by low- or very low-income persons:	<input type="text"/>
b. Percent owned by all others:	<input type="text"/>
<input type="button" value="Check"/>	<input type="button" value="Check"/>

2. Were 75 percent of the labor hours performed for the business over the prior three-month period performed by Section 3 workers?

a. Percent of total labor hours performed for the business over the prior three-month period that were performed by Section 3 workers:	<input type="text"/>
b. Percent of total labor hours performed for the business over the prior three-month period that were performed by all other workers:	<input type="text"/>
<input type="button" value="Check"/>	<input type="button" value="Check"/>

3. Is at least 51 percent of the business owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing?

a. Percent owned and controlled by current public housing residents or residents who currently live in Section-8 housing:	<input type="text"/>
b. Percent owned and controlled by all others:	<input type="text"/>
<input type="button" value="Check"/>	<input type="button" value="Check"/>

Section 3 Registry

<http://portal.hud.gov/hudportal/HUD?src=/section3businessregistry>

The Section 3 Business Registry – HUD’s online database can be used:

- by agencies that receive HUD Funds;
- by Section 3 residents to identify businesses that may have HUD funded employment opportunities;
- as a Searchable Listing of firms that have self-certified;
- as a Tool to assist recipients of HUD funding by enabling grantees to meet their Section 3 obligations by reducing some of the burden associated with locating eligible businesses

Section 3 Service Area

“Service area” or the “neighborhood of the project” means:

An area within one mile of the Section 3 project or, if fewer than 5,000 people live within one mile of a Section 3 project, within a circle centered on the Section 3 project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census.

Section 3 Workers

What Does “**Section 3 Worker**” Mean? A Section 3 worker is any worker who currently fits, or when hired within the past five years fit, at least one of the following categories, as documented:

1. The worker’s income for the previous or annualized calendar year is below the income limit established by HUD;
2. The worker is employed by a Section 3 business concern; or
3. The worker is a YouthBuild participant.

A “**Section 3 targeted worker**” for Community Development (Non-housing) projects is a Section 3 worker who:

1. is employed by a Section 3 business concern; or
2. currently fits or when hired fits at least one of the following categories, as documented within the past five years:
 - (i) Living within the service area or the neighborhood of the project, as defined in 24 CFR § 75.5; or
 - (ii) A YouthBuild participant

What is YouthBuild?

<https://youthbuild.org/our-programs/>

Academic and occupational skills training program serving youth ages 16 – 24 who have dropped-out of high school, or previously dropped-out and re-enrolled.

Additional Criteria:

- A member of a low-income family *and/or*
- A youth in foster care (including youth aging out of foster care) *and/or*
- A youth or adult offender *and/or*
- A youth with a disability *and/or*
- The child of an incarcerated parent *and/or*
- A migrant youth.

For more information, visit:

<https://www.dol.gov/agencies/eta/youth/youthbuild>





Service Area as Defined in 24 CFR 75.5



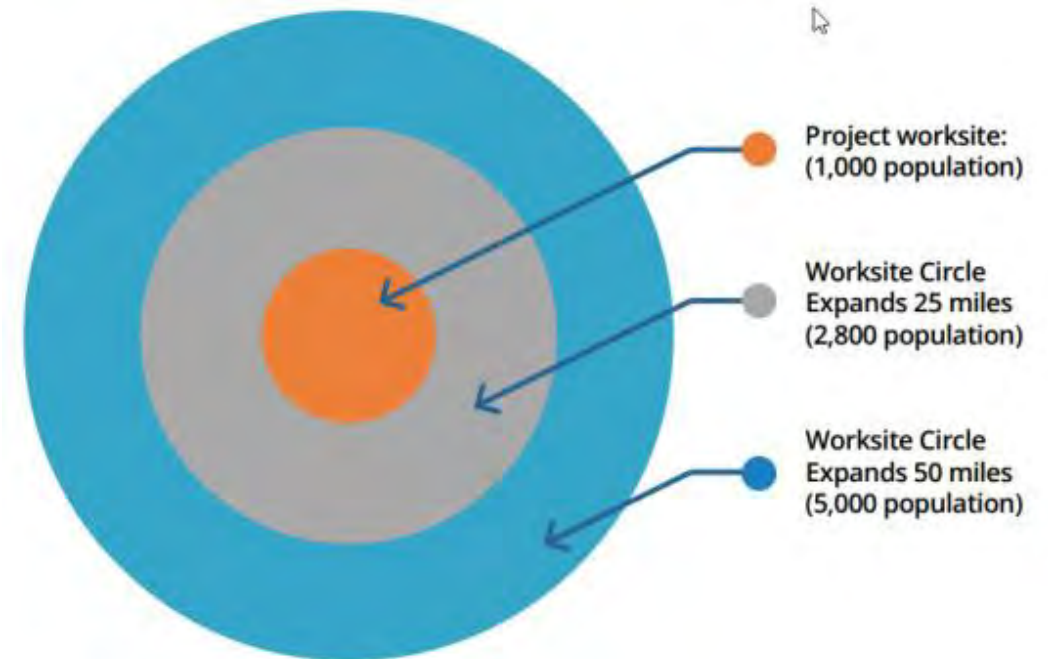
HCD

A. *Service Area* = an area within one mile of the Section 3 project

OR

B. If < 5,000 people live within one mile of Section 3 project,

Then, *Service Area* = an area within a circle centered around the Section 3 project site that encompasses 5,000 people.



*According to the most recent U.S. Census

Certification - Targeted Section 3 Worker

- An employer's confirmation that a worker's residence is within one mile of the work site or, if fewer than 5,000 people live within one mile of a work site, within a circle centered on the work site that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census;
- An employer's certification that the worker is employed by a Section 3 business concern; or
- A worker's self-certification of YouthBuild Participant

Sample Section 3 Business and Employment Notice

(Instructions: Publish as a display advertisement in the local paper's non-legal section or post at the local government and other Section 3 area locations.)

(Insert Locality's name) is preparing to carry out the *(insert Name of Project)* through the use of Community Development Block Grant Funds. In the implementation of this project the following job types may be available:

(Insert List of Job Classifications to be used during project)

All job openings will be posted at *(local government office or list other posting locations)*. To the greatest extent feasible, employment and training positions will be made available to qualified persons who permanently reside in *(Insert the County's or local municipality name as Section 3 area)*. Persons qualified for the jobs listed should register at the following location:

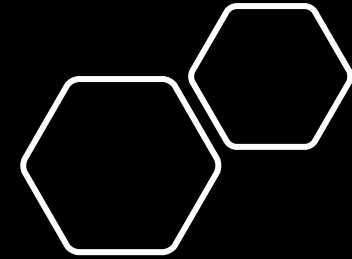
(Insert Name and Address of posting locations and/or Other Locations)

Additionally, the following contracts and procurements will/may be made and to the greatest extent feasible, businesses located in and owned by persons residing in *(Insert the County's name as Section 3 area)* will be utilized:

(Insert list of construction, non-construction, and service contracts to be procured during the project. Also, insert list of construction subcontracts, major, specific equipment and general types of materials to be used during the project.)

All above-referenced procurements will be made on a competitive basis. The names of businesses who respond to this notice will be included on procurement lists for this project. Names of job seekers will be given to contractors.

Any person residing or firm located in the above-named areas may request to participate in procurement opportunities associated with this project by contacting *(Insert local contact information)* within ten (10) days of this notice.



An individual who works or seeks to work on a Section 3 project must certify his/her eligibility to be classified as a Section 3 Worker or Targeted Section 3 Worker, as defined in 24 CFR part 75. The status of a Section 3 Worker or Targeted Section 3 Worker shall not be negatively affected by a prior arrest or conviction.

Please select the applicable classification.

I am a worker who currently fits or when hired within the past five years fit one of the following categories, as documented:

Section 3 Worker

☐ My income for the previous calendar year is below the income limit¹ established by HUD;

Targeted Section 3 Worker

☐ I am a YouthBuild participant ²; or

Unclassified

☐

Oklahoma Department of Commerce
Community Development
Monthly Section 3 Utilization Report

Reporting Period¹: From To

Contractor Name:

Contractor Address:

Contractor Phone Number:

Project Name:

Project Location²:

Contractor Type: Prime Contractor ☐ Subcontractor ☐

Section 3 Business Concern³: Yes ☐ No ☐

				Labor Hour Classification ¹⁰		
Employee Name	Work Classification ⁴	Section 3 Status ⁵	Total Labor Hours ⁶	Unclassified Labor Hours ⁷	Section 3 Labor Hours ⁸	Targeted Section 3 Labor Hours ⁹
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
		▼				
TOTAL:			0.00	0.00	0.00	0.00

CONTRACTOR CERTIFICATION:

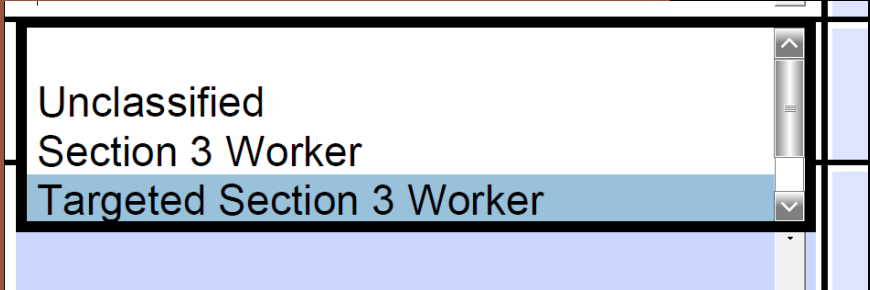
I hereby certify the accuracy of the data reported above.

Date:

Signature:

Name:

Title:



Submitted with Contractor's Monthly Pay Estimate & Weekly Payroll



Opportunity Portal

Section 3 Workers

- Search for employment and training opportunities
- Post Resume

Section 3 Recipients and Business Concerns

- Post job and training positions
- Search for job applicants
- Post contract opportunities

Section 3 Business Concerns

- Search for contracts

<https://hudapps.hud.gov/OpportunityPortal>



Employment Opportunities



Section 3
business



Job



Section 3
worker

The screenshot displays the HUD.gov Opportunity Portal. The header includes the HUD logo, 'HUD.GOV', and 'U.S. Department of Housing and Urban Development'. The main heading is 'Section 3 Opportunity Portal'. Below this, there are links for 'Home' and 'Search Jobs / Contracts'. A welcome message states: 'Welcome to HUD's Opportunity Portal. The Opportunity Portal helps match Section 3 Workers to jobs and training opportunities and Section 3 Businesses to contracting opportunities.' There are two main sections: 'Section 3 Workers' and 'Section 3 Recipients and Employers'. The 'Section 3 Workers' section includes links for 'Search for jobs and training opportunities' and 'Post your resume (sign in required)'. The 'Section 3 Recipients and Employers' section includes links for 'Post jobs and training positions (sign in required)', 'Search for jobs/contracts', and 'Post contracts (sign in required)'. A 'Search' overlay is visible, showing a search bar with the prompt 'Search the Section 3 Opportunity Portal for jobs, contracts, or registered businesses...'. It has tabs for 'Job Search' and 'Contract Search'. The 'Job Search' section includes a text input for keywords, a location input, and a 'Job Search Options' section. Under 'Job Type', there are checkboxes for 'Contract', 'Internship', 'Seasonal', 'Temporary', and 'Permanent', all of which are checked. Under 'Job Status', there are checkboxes for 'Full-time' and 'Part-time', both of which are checked. A 'Search' button is at the bottom of the search overlay. At the bottom of the page, there is a link: 'Have an opportunity to post? [Login here](#)'.

<https://hudapps.hud.gov/OpportunityPortal>



Employment Opportunities



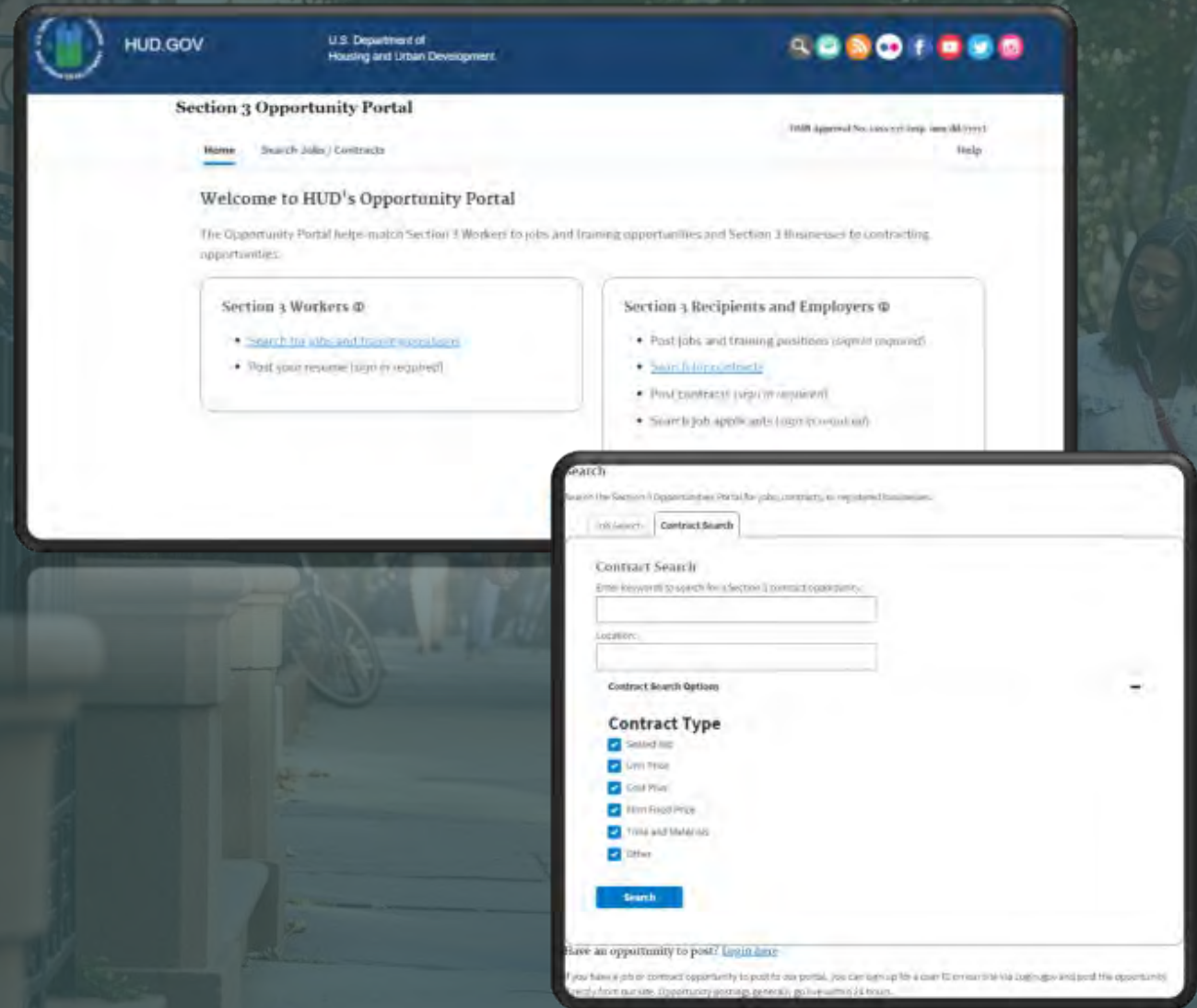
Grantee



Contract



Section 3
business



<https://hudapps.hud.gov/OpportunityPortal>



Section 3 Benchmarks

Section 3 projects are housing rehabilitation, housing construction, and other public construction projects assisted under HUD programs that provide housing and community development financial assistance when the total amount of assistance to the project exceeds a threshold of \$200,000.

For housing and community development financial assistance projects, the benchmark for Section 3 workers is set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

The benchmark for Targeted Section 3 workers is set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project. This means that the 5 percent is included as part of the 25 percent threshold.

Safe Harbor Benchmarks

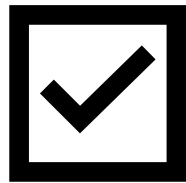


$$\frac{\text{Section 3 labor hours}}{\text{Total labor hours}} = 25\% \quad \text{AND} \quad \frac{\text{Targeted Section 3 labor hours}}{\text{Total labor hours}} = 5\%$$

Safe Harbor Compliance Check



What if a recipient can't meet the quantitative benchmarks + prioritization of effort?



Provide evidence that they have made **qualitative** efforts to assist low and very low-income persons with employment and training opportunities.

Safe Harbor Compliance Check

Complied with safe harbor if:

Met or exceeded the
Section 3 benchmarks

AND

Followed the required
prioritization of effort

Absent evidence of the contrary





Certification of Prioritization of Effort



HCD

Employment & Training

"to the greatest extent feasible"



Section 3 workers residing within the service area or neighborhood of the project

Participants in YouthBuild programs

Consistent with existing Federal, state, and local laws and regulations





Certification of Prioritization of Effort



HCD

Contracting

“to the greatest extent feasible”



Section 3 business concerns that provide economic opportunities to Section 3 workers residing within the service area or the neighborhood of the project

Participants in YouthBuild programs

Consistent with existing Federal, state, and local laws and regulations



Oklahoma Department of Commerce - Section 3 Reporting (24 CFR 75.25)			
CDBG Project Completion - Section 3 Final Closeout Report			
Grantee Name			
Grant Contract #			
Project Activity			
Const. Contractor			
Sub Contractor(s)			
		Benchmark Safe Harbor Met	
Enter the Total Labor Hours for the completed project		1	
Enter Total Targeted Section 3 Workers Labor Hours		0.0%	No
Section 3 Workers Labor Hours		0.0%	No
https://www.huduser.gov/portal/datasets/il.html			
This section below is required if, based on the labor hours reported above, the reporting entity did not meet the safe harbor benchmarks.			
X	Check all that apply. Please attach supporting documentation for each effort performed.		
	Outreach efforts to generate job applicants who are Targeted Workers, Workforce or Job Centers		
	Direct on the job training including apprenticeships		
	Indirect training such as arranging for contracting for or paying tuition for off-site training		
	Provided direct assistance to help Section 3 workers compete for jobs (e.g., resume assistance coaching)		
	Outreach efforts to identify and secure bids from Section 3 business concerns		
	Provide assistance to help Section 3 business concerns understand and bid on contracts		
	Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns		
	residents to jobs		
	Held one or more jobs fairs		
	Provided or connected residents with supportive services that can provide direct services or referrals		
	fees, transportation		
	Assisted residents to apply for/or attend community college or a four year educational institution		
	Assisted residents to apply for or attend vocational/technical training		
	Assisted residents to obtain financial literacy training and/or coaching		
	Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns		
	Provided or connected residents with training on computer use or online technologies		
	Other Efforts - Specify:		
Prepared by:		Date:	
	Name & Title/Entity		
**	Section 3 Labor Hours Reporting is required for all construction contracts awarded after 7/1/2021 and exceeds \$200,000 in grant funds.	Section 3 Report Form 2021	



Oklahoma Department of Commerce

Project Name and Number:	
Checklist Review by:	Contact Information:

Grantee Section 3 Review Checklist

NOTE: This form is to only be used for projects with over \$200,000 in HUD funding in which assistance or funds are committed on or after July 1, 2021.

- Section 3 FAQ: <https://www.hudexchange.info/section-3/faqs/>
- Learn about: https://www.hud.gov/program_offices/field_policy_mgt/section3
- Section 3 Training: <https://www.hudexchange.info/trainings/section-3/>
- Section 3: <https://www.hudexchange.info/programs/section-3/>

At Grant Award or RROF and Removal of Contract Conditions

- ☐ Grantee adopts a resolution and "Attachment A" Section 3 Plan to comply with Section 3 at 24 CFR Part 75. The regulations at 24 CFR Part 75 are applicable to projects for which assistance or funds are committed on or after July 1, 2021.
- ☐ Have the Section 3 poster promoting Section 3 Business Registry and the Section Opportunity Portal hanging up at the City or County Building as well as any relevant places in the community (Job centers, etc).

At the time project goes out to bid

- ☐ Bid advertisement contains Section 3 language.
- ☐ Bid Documents contain Section 3 language under 24 CFR Part 75. This includes a Bidder Intent to Comply with Section 3 that is required to be submitted with bid documents. There is also a FAQ on Section 3 that should be included for bidders.
- ☐ Send bid documents to compliance specialist for approval (Grant Administrator or ODOC Project Manager).
- ☐ The Section 3 contract opportunity has been posted at <https://hudapps.hud.gov/OpportunityPortal/> and documentation of posting has been obtained. An account log in will need to be created to post contract opportunities to this website. A print out should be provided for verification to the OKGrants file.

- ☐ Directly solicit Section 3 business. A listing can be found at the following link: <https://portalapps.hud.gov/Sec3BusReg/BRegistry/SearchBusiness>. Minority, Woman Owned, and Disadvantaged firms should also be directly solicited. Documentation must be in file.
- ☐ Any prebid meetings will need to discuss Section 3 requirements as well as documentation provided. Provide Section 3 monthly reporting form.
- ☐ Answer any questions bidders have regarding the new Section 3 regulations. Seek CDBG help if needed.

At the time of bid opening

- ☐ Verify Bid documents are completed with Section 3 requirements. The Section 3 Intent to Comply has also been signed by the bidder (contractor). In order to be an acceptable bidder, these must be completed. **Note:** Low- and very low-income individuals and Section 3 business concerns must be able to demonstrate that they have the ability or capacity to perform the specific job or successfully complete the contract that they are seeking.
- ☐ **Preconstruction Conference:** This is a very important time to discuss with contractor Section 3 compliance. Explain you must start early in the project to be in compliance with Section 3.
- ☐ It is very important contractors are made aware of their responsibilities; and grant recipients are required to ensure this has been completed. Ensure that contractors are made aware of their responsibilities and this is documented during the pre-construction conference.
- ☐ Provide the Section 3 monthly reporting form and explain all information on the form will be required. Discuss reporting requirements of Section 3 workers and Targeted Section 3 workers. The total number of labor hours that are worked on the Section 3 project must be reported along with how many hours are completed by Section 3 workers and Targeted Section 3 workers. **Note:** For those employers who do not track labor hours in detail through a time-and-attendance system, HUD does not require they acquire such a system. Instead, they may provide a good faith assessment of the labor hours for a full- or part-time employee. **A project can't be completed until these hours are reported to ODOC.** Explain that if safe harbor benchmarks aren't met, then the contractor is required to report a number of qualitative efforts to assist low- and very low-income persons with employment and training opportunities. Discuss with the contractor how they plan to meet the qualitative effort portion. **Seek help from your CDBG compliance specialist if needed.**
- ☐ Certification requirements and documentation of certification must also be present in a recipient's Section 3 file (OKGrants) for Section 3 Workers and Targeted Section 3 Workers. Explain what documentation is needed to be obtained by the company to verify Section 3 and Targeted Section 3 worker status.

Note: Recipients may report on Section 3 workers and Targeted Section 3 workers for five years from when their certification as a Section 3 worker or Targeted Section 3 worker is established. Section 3 is no longer tracked by new workers only.
- ☐ Inform contractor they will be required to sign a contract with Section 3 requirements. Ensure proper Section 3 language is in contract. See Sample Section 3 Plan for contractors.

- ❑ Encourage contractors if they are using subcontractors to directly solicit from Section 3, disadvantaged and small businesses. This is one way they can show qualitative efforts to meet Section 3 regulations. Direct solicitation of subcontractors must be documented.
- ❑ Discuss with company if they provide apprenticeship opportunities, training or education assistance. This is another way to show qualitative efforts to meet Section 3 requirements.
- ❑ Provide the contractor with the two Section 3 posters. Explain the first poster is to promote the Section 3 Business Registry and the Section Opportunity Portal. It should be hung at the worksite, place of business, and any other relevant places such as job centers. The second poster must be placed at the worksite (labor board area) with a designated Section 3 coordinator. These actions will provide one qualitative effort to meet Section 3 requirements if safe harbor benchmarks are not met. https://www.hud.gov/program_offices/field_policy_mgt/section3/products
- ❑ Explain the importance of having a Section 3 coordinator for the project. The Section 3 coordinator for the selected company should be able to answer Section 3 questions or obtain Section 3 information. The Section 3 poster that is required at the job site requires a coordinator and contact information including an email and phone number. This is stated in the bidder intent to comply. All Section 3 inquiries should be documented.
- ❑ Ensure contractor fully knows Section 3 responsibilities. Explain the business can be prevented from bidding on future Section 3 projects if willful noncompliance is shown.
- ❑ Ensure documentation requirements of Section 3 are fully understood by contractor.

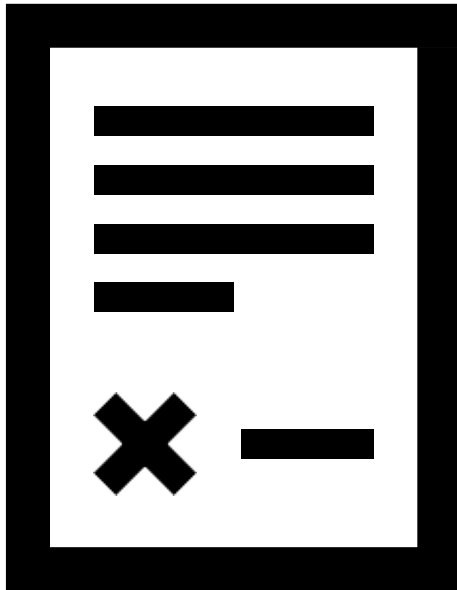
Final payment/ Monitoring/Project Closure

- ❑ One of the most important requirements is to keep adequate documentation of Section 3 requirements in grantee's file and this will be verified at monitoring. Record keeping requirements for recipients are found at 24 CFR § 75.31. Recipients are required to maintain documentation to demonstrate compliance with the regulations and are responsible for requiring their contractors/subcontractors to maintain or provide any documentation that will assist recipients in demonstrating compliance, including documentation that shows hours worked by Section 3 workers, Targeted Section 3 workers, and any qualitative efforts to comply with Section 3. Examples of documentation can be found in 24 CFR §75.31. Maintain supporting documentation that reflects the recipient's Section 3 compliance activities, along with affirmative action and equal opportunity efforts in the areas of employment, program benefits, contracting, and housing activities.
- ❑ Maintain direct solicitation, advertisements, and procurement records. Ensure contractor has Section 3 reporting requirements. Before final payment, it is encouraged to obtain this information.
- ❑ Section 3 closeout report must be completed for project closeout and submitted to ODOC.

If Section 3 reporting information is not obtained, a project cannot be closed as ODOC is required to report Section 3 information directly to HUD.



Components of a Section 3 Plan



- Policy Statement/Purpose
- Section 3 Applicability
- Section 3 Goals/Safe Harbor Benchmarks
- Recipient and Contractor Responsibilities
- Prioritization and Eligibility Requirements for Workers and Businesses
- Section 3 Certification Procedures for Workers and Businesses
- Reporting Deadlines
- Complaint Procedures





Training and Employment

Section 3 in Action

Recruiting	Hiring/Training	Certifying
Section 3 Workers and Targeted Section 3 Workers	Eligible and Qualified Workers	Section 3 Workers and Targeted Section 3 Workers



Consider the “order of priority” listed in part 75.9 and 75.19 when providing training and employment to workers



Section 3 and Professional Services

Professional Service Contracts are **NOT REQUIRED** to be reported under Section 3:

Professional service contracts for non-construction services that require an advanced degree or professional licensing are not required to be reported as a part of total Section 3 labor hours. However, this exclusion does not cover all non-construction services.

Section 3 Training

https://www.hudexchange.info/trainings/section-3/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=a08777d070-Section-3-Online-Training-Available%2F17%2F2020&utm_medium=email&utm_term=0_f32b935a5f-a08777d070-18480169

F A Q guidance

<https://www.hud.gov/sites/dfiles/FPM/documents/Section-3-FAQs.pdf>

"Understanding Section 3" Training Curriculum

Each year the U.S. Department of Housing and Urban Development (HUD) invests billions of federal dollars into distressed communities across the country for projects that build and rehabilitate housing, improve a variety of infrastructures, build community centers, and help families achieve stability and advancement. One way that HUD achieves these objectives is through the promotion and administration of Section 3. Section 3 is a provision of the HUD Act of 1968 and is found at 12 U.S.C. 1701u.

Per this statutory language, recipients of HUD funds (i.e. grantees and contractors) ensure that “to the greatest extent feasible,” when certain HUD funds are used to assist housing and community development projects, preference for construction-related training, jobs, and contracting opportunities go to low- and very-low income people and to businesses that are owned by low- and very-low income persons or businesses that hire them. These opportunities are both gender and race neutral.

In order to bolster the capacity of HUD’s funding recipients and Section 3 businesses regarding the Section 3 provision, HUD has developed the Understanding Section 3 training curriculum. The overall objective of the training curriculum is to provide participants with the tools and resources necessary to become well-versed and knowledgeable in this provision of the Housing and Urban Development Act of 1968 and its implementing regulations.

This online, self-directed training curriculum consists of eight modules that cover a variety of Section 3 relevant topics. These modules are designed to assist the user in better understanding the definition of Section 3 and how to comply with its requirements. The Understanding Section 3 training curriculum includes the following eight modules:

1. Understanding Section 3
2. Implementation of Section 3 Requirements
3. Procurement Requirements of Section 3
4. Grantee Oversight Responsibilities and SPEARS
5. Compliance and Monitoring
6. HUD Programs Covered by Section 3
7. Best Practices
8. Opportunity Portal

Upon completion of the training modules, the user should have a better understating of the provision and be better positioned to comply with Section 3 requirements and guidance.

[Launch the Section 3 Training](#)

[Provide Feedback](#)



Additional Resources

These supplemental documents and resources assist participants in effectively implementing and carrying out a robust Section 3 program following the completion of this training curriculum.

- [Regulation for Section 3: 24 CFR Part 75](#)
- [Benchmark Notice for Section 3](#)
- [Section 3 Website](#)
- [Section 3 FAQs](#)
- [Section 3 Business Registry](#)
- [Section 3 Opportunity Portal](#)
- [Section 3 Regional Points of Contact](#)













What are the Low-Income & Very Low-Income Limits?

- Defined at Section 3(b)(2) of the Housing Act of 1937
- Determined annually by HUD
- Section 8 income limits are used to determine eligibility
- Limits are typically established at 80 percent and 50 percent of the area median **individual** income

HUD income limits found at:

<https://www.huduser.gov/portal/datasets/il.html>



-  404.10 Section-3 Grantee-Checklist.pdf
-  404.11 Section-3 Grantee-Sample Plan.docx
-  404.12 Section-3 Grantee-Sample Resolution.docx
-  404.13 Section-3 HUD Complaint Form.pdf
-  404.2 Section-3 Business Registry_GETCONNECTEDPOSTER.pdf
-  404.3 Section-3 Business-and-Employment-Notice-Sample.docx
-  404.4 Section-3 Clause.pdf
-  404.5 Section-3 Contractor-Business Self Certification.pdf
-  404.6 Section-3 Contractor-Estimated-Workforce-Breakdown-Form 2021.pdf
-  404.7 Section-3 Contractor-Sample Plan.docx
-  404.8 Section-3 Contractor-Utilization Monthly Report.pdf
-  404.9 Section-3 Contractor-Worker Status Certification.pdf

MODIFICATIONS REQUEST & APPROVALS

APPROVED

DECLINED

Approval letters will be sent out for the following requests:

Contract Extensions

Budget Modifications

Single Bid

120 day “RROF” Extensions

Change of Scope

- All requests other than Budget and Contract modifications must be submitted via email to both Christy and Robin for processing
 - * Remember to upload or attach supporting documentation pertaining to the individual requests
 - * Reminder to Change status to submit modifications in OKGrants

Project Manager receives the modification request and processes in OKGrants with a response letter uploaded

*or if request is received by email -

A response letter will be emailed back to the Authorized Official and the Grant Administrator and uploaded in monitoring section

POLICY 401 PROJECT AND BUDGET MODIFICATIONS

Effective October 1, 2021, see Policy 401 Program Management for full details.

- REQUEST FOR ADDITIONAL FUNDS – CONSTRUCTION ONLY – ONE-TIME INCREASE
 - Grantee Letterhead / Authorized Official
 - OKGrants Modification
- BIDS RECEIVED WERE OVER PROPOSED PROJECT BUDGET
 - First bid?
 - Alternatives Discussed for re-bid?
- PROCUREMENT REQUIREMENTS MET
 - Adequate Solicitation, Bid Ads, Plan Rooms, Bid Sheet & Tabulation
- ODOC REVIEW COMMITTEE
 - The ODOC Review Committee will review and consider request
 - Division Director, Director of Programs-Planning, Director of Programs-Monitoring, Program Planner, Project Manager, Budget Officer

OKGrants

Roles & Status Pushes



Assisting Communities with Current Contact Information

It is important that the contact information in OKGrants be as up-to-date as possible

- Changes in elected officials or staff at the local level
- ODOC correspondence – we use OKGrants to send correspondence
- ODOC Technical Assistance Training – we use OKGrants upon contract award for invites to training
- Assist communities with roles in OKGrants

Agency Administrator

- Creates new user roles for their organization
- The only role with access to My Organization links
- Has access to view all applications for the organization
- Is linked to all project numbers associated with the organization

Authorized Official

- Is the only role that can submit an Application, Closeout
- Is linked to all project numbers associated with the organization
- Executes Contracts and submits RROF
- Full Permissions

Financial Officer

- Has access to view & write in the application
- Is linked to all project numbers associated with the organization
- Access to view, edit, and submit pay advance requests & expenditure reports, modifications, audits

Writer

- Can initiate, edit/write and cancel an Application
- Access to upload supporting documents
- Is linked to all project numbers associated with the organization

Viewer

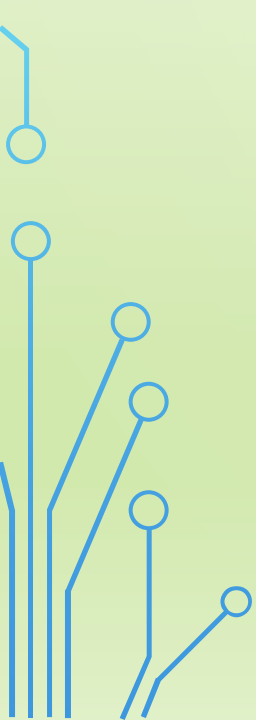
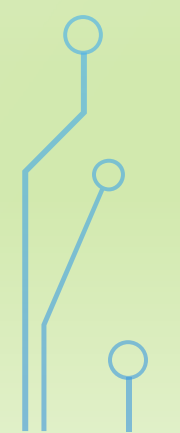
- Has access to view the application and all uploads
- Linked to all project numbers associated with the organization
- Cannot Edit or Save
- Role Used for Auditors

Current CDBG Staff & Roles





ALICIA

- ❖ Leadership
 - Excellence in providing staff with program guidance and positivity
- 
- 

ROBIN

❖ Project Management

- Small Cities Contracts
 - contract award to closeout
- All Environmental Reviews (RROF)
 - except CIP
- Wage Rates and 10-day calls
- Notice of Contract Awards
- Technical Assistance/Training
- Project Management Guide Updates

CHRISTY

❖ Project Management

- after ROF - except for CIP and Small Cities
- Monitoring
- Closeout
- Technical Assistance/Trainings
- Project Management Guide Updates

LINDA

❖ Administrative Assistance

- Letters
- Trainings



CDBG Monitoring



Alicia Hibbets, Director of Programs

(405) 815-5385

Christy Davis, Project Manager

(405) 215-5395

Robin Slawson, Senior Program Monitor

(405) 881-3044

Linda Goode, Administrative

(405) 815-5351

Q & A

Group Discussion



THANK YOU FOR
ATTENDING!

